

SUE P. FAHAMI
Acting United States Attorney
District of Nevada
Nevada Bar No. 5634
NICOLE R. LEIBOW
Assistant United States Attorney
U.S. Attorney's Office
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Email: Nicole.Leibow@usdoj.gov

Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Laura Leigh, and Wild Horse Education,

Plaintiffs,

v.

Interior Board of Land Appeals, United
States Department of Interior, Bureau of
Land Management, and KG Mining, Inc.,

Defendants.

Case No. 3:25-cv-00039-ART-CDS

**Stipulation and Order to Extend Time
to Answer**

(First Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiffs Laura Leigh and Wild Horse Education ("Plaintiffs"), Defendant KG Mining (Bald Mountain) Inc. ("KG Mining"), and Federal Defendants Interior Board of Land Appeals, United States Department of Interior, and Bureau of Land Management, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiffs filed their Petition on December 23, 2024. ECF No. 1.

Plaintiff served Federal Defendants with a copy of the Summons and Petition via certified mail on January 7, 2025. ECF No. 18.

The current deadline for Federal Defendants to respond to Plaintiff's Petition is March 10, 2025. *Id.*

On March 6, 2025, respective counsel for Plaintiffs, Defendant KG Mining, and Federal Defendants agreed to a 17-day extension of time for Federal Defendant to review the record and applicable agency regulations, including 43 C.F.R. § 4.410(a), which is the

subject of Plaintiffs' Petition. The standard for extending time is good cause. See FRCP 6(b)(1)(A).

Accordingly, the parties, through undersigned counsel, submit this stipulation to a 17-day extension from March 10, 2025, to **March 27, 2025**, for Federal Defendant to file a response to the Petition. This is Federal Defendants' first request for an extension of time.

To incorporate the terms of the Court's March 5, 2025, Order (ECF No. 23) authorizing KG Mining's March 4, 2025, stipulation extending the period of time for Defendant KG Mining to respond to the Petition (ECF No. 22), the parties agree the deadline for KG Mining to respond to the Petition will be extended correspondingly to **April 7, 2025**.

This stipulated request is filed in good faith and not for the purposes of undue delay.

Respectfully submitted this 6th day of March 2025.

GREENFIRE LAW, PC

/s/ Jessica Blome

Jessica L. Blome, Esq. (*pro hac vice*)

J. Rae Lovko, Esq. (*pro hac vice*)

2748 Adeline St., Ste. A
Berkeley, CA 94703

jblome@greenfirelaw.com
rlovko@greenfirelaw.com

and

Brent M. Resh

Nevada Bar No. 14940

BRENT RESH LAW, PLLC

2401 La Solana Way

Las Vegas, NV 89102

brent@brentreshlaw.com

Attorney for Plaintiffs

SUE P. FAHAMI

Acting United States
Attorney

/s/ Nicole Leibow

NICOLE R. LEIBOW
Assistant United States
Attorney

501 Las Vegas Blvd. So.,
Ste. 1100
Las Vegas, NV 89101

*Attorneys for the Federal
Defendants*

PARSONS BEHLE &
LATIMER

/s/ Ashley Nikkel

Ashley C. Nikkel

Nevada Bar No. 12838

Jim B. Butler

Nevada Bar No. 8389

50 W. Liberty St., Ste. 750
Reno, NV 89501

anikkel@parsonsbehle.com
jbutler@parsonsbehle.com

*Attorneys for Defendant KG
Mining (Bald Mountain) Inc.*

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____